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Proposed Attorneys for Debtor Naartjie Custom Kids, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

NAARTJIE CUSTOM KIDS, INC.,

Debtor.

Bankr. Case No. 14-29666

Chapter 7

The Honorable William T. Thurman

**NOTICE OF FILING DEBTOR'S FIRST DAY MOTIONS AND NOTICE OF HEARING
ON DEBTOR'S FIRST DAY MOTIONS**

Hearing Date: September 15, 2014 at 2:00 p.m. (Mountain Time)

PLEASE TAKE NOTICE that on September 12, 2014, Naartjie Custom Kids, Inc. (“Naartjie” or “Debtor”), the debtor in possession in the above captioned bankruptcy case, filed a voluntary petition for relief under title 11 of the United States Code (the “Bankruptcy Code”) with the Clerk of the United States Bankruptcy Court for the District of Utah. The Debtor is continuing to operate its business and manage its affairs as a debtor and debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtor will present the following motions on September 15, 2014, at 2:00 p.m., prevailing Mountain time, at a hearing before the Honorable Joel T. Marker, in his courtroom, Room 341, of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101:

1. *Debtor's Motion Pursuant to 11 U.S.C. §§ 105, 363, and 503 and Fed. R. Bankr. R. 6003 and 6004 for Interim and Final Orders Authorizing (I) the Debtor to Honor Prepetition Obligations to and Continue Prepetition Practice with a Certain Critical Vendor and Certain Shippers; (II) Authorizing all Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the "Critical Vendors Motion").* [Docket No. 3]
2. *Emergency Motion for Order Authorizing Debtor to Continue Use of its Existing Bank Accounts and Existing Business Forms (the "Cash Management Motion").* [Docket No. 4]
3. *Emergency Motion for Interim and Final Orders (I) Authorizing but not Directing Payment of Pre-Petition Wages, Salaries, and Related Obligations and Taxes; (II) Directing All Banks to Honor Checks and Transfers for Payment of Pre-Petition Employee Obligations; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the "Wages and Employee Obligations Motion").* [Docket No. 5]
4. *Motion for Entry of Interim and Final Orders: (I) Authorizing, but not Directing, Debtor to (A) Maintain Existing Insurance Programs and (B) Pay all Obligations in Respect Thereof; (II) Directing Financial Institutions to Honor and Process All*

- Related Checks and Electronic Payment Requests; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Insurance Motion”). [Docket No. 6]*
5. *Motion for Entry of Interim and Final Orders (I) Authorizing, but not Directing, the Debtor to Honor Certain Prepetition Customer Obligations and to Continue Prepetition Customer Programs and Practices in the Ordinary Course of Business; (II) Authorizing Payment of Credit Card Processing Fees; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Customer Programs Motion”). [Docket No. 7]*
6. *Debtor’s Motion for Interim and Final Orders (I) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service to the Debtor on Account of Pre-Petition Invoices, (II) Approving the Debtor’s Proposed Form of Adequate Assurance of Future Payment, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Scheduling a Final Hearing (the “Utilities Motion”). [Docket No. 8]*
7. *Debtor’s Motion for Entry of Interim and Final Orders: (I) Authorizing, but not Directing, the Debtor to Pay Certain Pre-Petition Sales, Use, Customs, Income, Property, and Other Miscellaneous Taxes and Fees; (II) Granting Related Relief; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Taxes Motion”). [Docket No. 9]*
8. *Debtor’s Motion for Interim and Final Orders (I) Authorizing Debtor in Possession to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and*

- 364; (II) Granting Liens, Security Interests, and Superpriority Claims; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief (the “DIP Motion”).*
9. *Application of the Debtor for Entry of an Order Authorizing the Retention and Employment of Dorsey & Whitney LLP as Counsel for the Debtor (the “Dorsey Employment Application” and collectively with the foregoing motions and applications, the “First Day Motions”).*

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions can be obtained by contacting the Debtor’s undersigned proposed counsel.

DATED this 12th day of September, 2014.

DORSEY & WHITNEY LLP

/s/ Annette W. Jarvis

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*Proposed Attorneys for Debtor Naartjie
Custom Kids, Inc.*